

1 ROBERT WAGGENER - SBN: 118450
2 LAW OFFICE OF ROBERT WAGGENER
214 Duboce Avenue
3 San Francisco, California 94103
Phone: (415) 431-4500
Fax: (415) 255-8631
4 E-Mail: rwlaw@mindspring.com

5 Attorney for Defendant RUSSELL OTT

6

7

8 **UNITED STATES DISTRICT COURT**
9 **NORTHERN DISTRICT OF CALIFORNIA**

10

11 UNITED STATES OF AMERICA

No. CR-17-0533 EMC

12

Plaintiff,

**STIPULATION AND [PROPOSED]
ORDER MODIFYING TRAVEL
CONDITIONS**

13

v.

14

RUSSELL TAYLOR OTT,

15

Defendant.

/

16

17 **IT IS HEREBY STIPULATED** by and between the parties that the following
18 modifications can be made to the conditions of release for defendant Russell Taylor Ott in the
19 above entitled case. These modifications are for Mr. Ott to address insurance needs for his
20 medical and dental issues, and to allow Mr. Ott to resume attending AA meetings in March given
21 his performance on release.

22

23 After working out the logistics, location, and scheduling with United States Pretrial
Services, and with their permission, Mr. Ott is allowed to travel to the following locations:

24

- 1) A local Social Security office so that Mr. Ott can continue the process of setting up Medi-Care coverage for his medical treatment and expenses;
- 2) A local California Health and Human Services office so that Mr. Ott can set up Medi-Cal coverage for his dental treatment and expenses. (Medi-Care does not cover his dental treatment.)

1 In addition, at the discretion of United States Pretrial Services and based on Mr. Ott's
2 continued compliance with his release conditions, after March 1, 2019 Mr. Ott is allowed to
3 attend AA meetings after securing the permission of United States Pretrial Services and
4 providing any requested logistical information regarding the meetings.

5 Counsel Robert Waggener has verified that United States Pretrial Services Officer Josh
6 Libby has no objection to the proposed modifications of Mr. Ott's release conditions, and that
7 Mr. Ott is otherwise in compliance with his release conditions.

8 All other conditions of Mr. Ott's release conditions are to remain in effect.
9
10

11 Dated: February 15, 2019

/s/

ROBERT WAGGENER
Attorney for Defendant
RUSSELL TAYLOR OTT

15 Dated: February 15, 2019

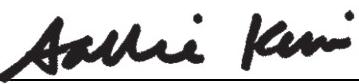
/s/

MEREDITH OSBORN
Assistant United States Attorney

18 **[PROPOSED] ORDER**

20 **IT IS SO ORDERED.**

22 Dated: February 19, 2019


SALLIE KIM
United States Magistrate Judge